

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-DFB
Plaintiffs	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	

**UNOPPOSED MOTION TO EXTEND TIME TO  
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Apple Inc., Google LLC, YouTube LLC, Microsoft Corporation, Inc., Mozilla Corporation, and Poshmark, Inc. (collectively “Moving Defendants”) respectfully request the Court grant this motion to extend their time to respond to Plaintiff’s Fifth Amended Complaint in order for the Moving Defendants to file a joint Rule 12 response as set forth in the concurrently filed Motion for Coordinated Rule 12 Briefing, Dkt. 98.

WHEREAS, on April 14, 2025, the Court set a deadline for each of the Moving Defendants to answer or otherwise respond to the Fifth Amended Complaint on or before May 14, 2025 (Dkt. 94 at 4);

WHEREAS, the Moving Defendants believe that the Court and all parties would benefit if they submit one joint Rule 12 response to the complaint, rather than filing five separate Rule 12 responses for each of the Moving Defendants;

WHEREAS, the Moving Defendants desire additional time to jointly draft and agree upon a joint Rule 12 response and believe that they will need an additional 30 days beyond the current deadline to do so;

NOW, THEREFORE, in support of this Motion, Moving Defendants state as follows:

1. Moving Defendants are diligently investigating Plaintiff's allegations.
2. Moving Defendants respectfully request that the Court order that the time for them to file a Rule 12 response to the Fifth Amended Complaint be set for June 13, 2025.
3. Plaintiff does not oppose this request for extension.
4. No party will be prejudiced by this Court granting an extension, and this motion is not being filed for purposes of harassment or delay.
5. Because Plaintiff concurs in this request and the reasons for the request are set forth in the body of this motion, no supporting brief is required pursuant to Middle District Local Rule 7.5.

Date: May 6, 2025

Respectfully submitted,

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